WORK ACTIVITY

Contingency Plan for Recovery Actions

May 5, 2011

ACTA, POLB and POLA have been served with an Order for Removal, Mitigation or Prevention of a Substantial Threat of Oil Discharge by the USEPA (OPA CWA 311-09-2011-0001) with regard to the Dominguez Channel Oil Spill. ACTA and the Ports have undertaken various work activities under EPA oversight in response to the Order. Crimson Pipeline Management Company (Crimson) has been recently issued a similar order by USEPA (OPA CWA 311-09-2011-0002).

The site is located along the ACTA Right of Way south of Alameda Street adjacent to the Tesoro Refinery in an area commonly referred to as the Texaco Slot. It appears that fugitive oily product entered the track storm drain system within the ACTA Right of Way in the area north of Pacific Coast Highway ,and then migrated south during the winter storms, where the oily waste was discharged into Leeds Avenue near the intersection with Grant Street. The oily runoff then entered the City of Los Angeles' storm drain system on Leeds Avenue just north of the intersection with Opp Street and traveled south into the City's sump lift station located on I Street, where it ultimately discharged into the Dominguez Channel.

On January 16, 2011, ACTA assumed the responsibility of the containment and treatment of the oily water flowing in the track storm drain system within the ACTA Right of Way. The containment and treatment of the oily water have included the following:

- Personnel and equipment were mobilized to the site to remove the oil from the storm water during rain events flowing out of the 18" corrugated steel pipe (CSP) located north of the intersection of Leeds Avenue and Grant Street. The oily water was directed south into a plastic lined channel containing multiple weirs constructed of sandbags, and then into a larger area for final treatment prior to being discharged into the Leeds Avenue curb and gutter system. At a later time, an additional and larger containment and treatment area was constructed as discussed below. Removal activities to skim the floating oil from on top of the water were performed including the use of a vacuum truck, an oil skimmer, and multiple absorbent pads and booms. Skimmed product and other impacted materials (e.g., pads and booms) have been contained in covered tanks and roll off bins at the site, respectively.

- Between February 14 and 19, 2011, improvements were constructed adjacent to the Shell Lubricant Facility to contain and remove the oily water flowing out of the ballast and west into the Shell Lubricant Facility parking lot and into a storm drain. Eight (8) well locations were installed and consisted of 15-in diameter perforated pipes placed in a vertical position to an approximate depth of 4-ft below ground surface. The perforated pipes were placed 2-ft above the ground surface and at varying distances from each other. A 2-in diameter manifold system allowed the oily water to be removed from each well through a wire mesh strainer with a diaphragm pump and into a 21,000-gal Baker tank. Initially the oily water was removed twice daily but as the recovery of the oily water slowed, the removal of the oily water has become

unnecessary during non-rain events. The removal of the oily water is still necessary during a rain event.

- On February 16 and 17, 2011, an additional treatment and containment area was constructed in Leeds Avenue and connected to the initial system constructed by the EPA and its contractors. This additional area included the placement of K-Rail in a rectangular configuration lined with plastic sheeting. The 20 foot wide panels of plastic sheeting were overlapped by about 2 feet and the edges were duct taped and then covered with sand bags to assist in making the area more water tight. Four separate weir areas were constructed to better contain and treat the oily water. Absorbant pads and booms have been used to remove floating oil from on top of the water collectedin this larger area.

- On January 21, 2011, the EPA and the City of Los Angeles requested ACTA and the Ports to assume the maintenance and operation (M&O) of the City of Los Angeles storm drain laterals and lift station until the oil could be removed from that system. From February 28 to March 17, 2011, the oil was removed from the storm drain laterals and lift station by applying hot water at high pressures. In some areas, enhancements (including multiple passes and higher pressures) were used to remove the oil. On March 18, 2011, the City of Los Angeles accepted the cleanup activities and assumed M&O responsibilities of their system. Therefore, this work activity will not be included in the subsequent discussion below.

Currently, the above described work activities related to the containment and treatment of the oily water have only been necessary during rain events. Rainy season is defined by the Los Angeles County Department of Public Works as October 15 to April 15 and by the City of Los Angeles Department of Public Works as October 1 to April 15. Therefore, ACTA requests permission to demobilize the following equipment and materials from the site during the dry season: 300-feet contractor boom with anchor systems (2), air compressor, 3-inch diaphragm pump, trash pump (2), 3” hoses (2), weir skimmer, 20-foot storage container (2), portable toilet (2), and portable hand wash station. However, if at any time during the dry season (April 15 to October 1), rain has been forecast to occur at a likelihood of 40% or greater, then the necessary equipment and materials will be put on standby, and an individual will be placed at the site as a visual monitor. It should be noted that ACTA’s contractor, NRC Environmental, has a storage yard within 2 miles of the site and can mobilize personnel and equipment on very short notice. The tanks and roll off bins will remain at the site since they contain accumulated waste. The constructed containment and treatment areas also will remain in place.

ACTA is proceeding with the work under a full reservation of all its rights, remedies, and defenses.